

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. _____

v. : DATE FILED: _____

LIZA JONES MARIE BUSH GINGER HANDS YOLANDA DEMPSEY TOMIKA CAISON DELORES DOLISON NICOLE DOLISON	: VIOLATIONS:	18 U.S.C. § 371 (Conspiracy to commit an offense against the United States - 1 Count) 18 U.S.C. § 666 (Theft/bribery concerning a program receiving federal funds - 6 Counts)
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I N D I C T M E N T

COUNT ONE

THE GRAND JURY CHARGES THAT:

At times material to this Indictment:

The Voucher Program

1. The Department of Housing and Urban Development (HUD) was the federal government agency charged with providing and regulating federal funding for housing, including low-income housing.

2. The Philadelphia Housing Authority (PHA) was the public housing authority charged with providing housing in accordance with HUD rules and regulations in the Philadelphia area.

3. PHA was an organization which received benefits in excess of \$10,000 in any one-year period under a federal program involving grants, subsidies, and other forms of federal assistance.

4. “Housing Choice” was a program, also known as Section 8, which was funded by HUD and administered in the Philadelphia area by PHA. Through “Housing Choice,” PHA provided rental assistance to low-income families in privately owned housing.

5. The HUD Housing Choice Voucher Program (Voucher Program) was a federal government program for assisting low-income families, the elderly, and the disabled afford decent, safe, and sanitary housing in the private market.

6. In the Voucher Program, HUD paid rent and utility subsidies so eligible families could afford decent, safe and sanitary housing. In the Philadelphia area, the Voucher Program was administered by PHA. HUD provided housing assistance and administration funds to PHA.

7. Under the Voucher Program, PHA maintained a waiting list of eligible applicants; maintained information that permitted PHA to select participants from the waiting list in accordance with PHA admission policies; conducted credit and background checks of applicants; reviewed applications of the Housing Choice program; certified program eligibility of applicants; selected participants in accordance with admission policies in the PHA administrative plan; inspected and certified that housing units met Housing Quality Standards and approved units for leasing and contracts; determined the amount of Housing Assistance Payments to landlords on behalf of families, and made such payments; conducted annual recertifications for continued

eligibility for participants; and monitored program performance and compliance of landlords and families.

8. With few exceptions, families were selected by PHA for inclusion into the Voucher Program by the use of periodic lottery drawings known as "wait list pulls". Throughout 2001, there were approximately 27,000 applications in the applicant pool awaiting Section 8 housing subsidies.

9. When a family was selected by the lottery, PHA issued an appointment letter for the family to obtain a voucher. Once the voucher was issued, the family would then have an extendable 60-day period to search for a housing unit. If the family found a housing unit, and the owner was willing to lease the unit under the Voucher Program, the family would request PHA approval.

10. If PHA approved, PHA would enter into a Housing Assistance Payments (HAP) contract with the owner, in which HUD, through PHA, would pay a monthly rent subsidy to the owner on behalf of the family from the federally funded Voucher Program. In some cases, PHA would also pay a monthly utility subsidy directly to the family from the federally funded Voucher Program. (Rent and utility subsidies are hereafter referred to collectively as "housing subsidies.")

Charmaine Mabry as a PHA Official

11. Charmaine Mabry, charged elsewhere, was employed by PHA as a Section 8 Eligibility Department clerk.

12. Charmaine Mabry's responsibilities included initiating criminal background checks on potential recipients of Section 8 benefits to screen out ineligible persons.

13. Charmaine Mabry also was responsible for accessing the PHA computer database on persons on the Section 8 wait list and making appropriate entries regarding criminal histories of potential clients.

14. From in or about May 2001 to in or about at least August 2002, in the Eastern District of Pennsylvania and elsewhere, defendants

LIZA JONES
MARIE BUSH
GINGER HANDS
YOLANDA DEMPSEY
TOMIKA CAISON
DELORES DOLISON
NICOLE DOLISON

conspired and agreed with each other, and with and Charmaine Mabry, to commit an offense against the United States, that is to embezzle, steal, obtain by fraud, and otherwise without authority knowingly convert to the use of a person other than the rightful owner, and intentionally misapply, property valued at \$5,000 or more, that is money, in the form of monthly housing subsidies paid to landlords on behalf of, and directly to, the co-conspirators described above, totalling at least \$42,647, which money was owned by and under the care, custody and control of PHA, in violation of Title 18, United States Code, Sections 666(a)(1)(A) and (b).

MANNER AND MEANS

15. It was a part of the conspiracy that Charmaine Mabry solicited and accepted money, in her role as an agent of PHA, in exchange for bypassing the Section 8 lottery wait list system and causing appointment letters to be generated and provided to individuals to enable those individuals to obtain vouchers for housing and housing subsidies under the Voucher Program to which they were not then entitled.

16. It was a part of the conspiracy that Charmaine Mabry paid referral fees to individuals who brought to Charmaine Mabry others willing to pay for vouchers and housing subsidies under the Voucher Program to which they were not then entitled.

OVERT ACTS

In furtherance of the conspiracy, defendants LIZA JONES, MARIE BUSH, GINGER HANDS, YOLANDA DEMPSEY, TOMIKA CAISON, DELORES DOLISON, and NICOLE DOLISON, and Charmaine Mabry, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. In or around May 2001, Charmaine Mabry told defendant LIZA JONES that she could arrange to expedite the process for defendant LIZA JONES to obtain a Section 8 voucher in exchange for \$400.

2. In or around May 2001, Charmaine Mabry told defendant LIZA JONES that she would also arrange to obtain Section 8 housing vouchers more quickly for any friends of defendant LIZA JONES.

3. In or around May 2001, defendant LIZA JONES told defendants MARIE BUSH and GINGER HANDS about Charmaine Mabry's scheme.

4. In or around May 2001, defendants MARIE BUSH and GINGER HANDS told defendant LIZA JONES to provide their names and telephone numbers to Charmaine Mabry in order for defendants MARIE BUSH and GINGER HANDS to obtain Section 8 vouchers through Charmaine Mabry.

5. In or around May 2001, defendant LIZA JONES provided the names and telephone numbers of defendants MARIE BUSH and GINGER HANDS to Charmaine Mabry.

6. On or about May 15, 2001, Charmaine Mabry accessed the PHA database and made fraudulent entries so that Section 8 housing subsidies would be provided on behalf of defendant LIZA JONES.

7. On or after May 15, 2001, defendant LIZA JONES paid \$400 to Charmaine Mabry for causing a PHA Section 8 appointment letter to be issued to defendant LIZA JONES.

8. On or about May 15, 2001, Charmaine Mabry accessed the PHA database and made fraudulent entries so that Section 8 housing subsidies would be provided on behalf of defendant MARIE BUSH.

9. On or after May 15, 2001, defendant MARIE BUSH paid \$400 to Charmaine Mabry for causing a PHA Section 8 appointment letter to be issued to defendant MARIE BUSH.

10. On or about May 23, 2001, Charmaine Mabry accessed the PHA database and made fraudulent entries so that Section 8 housing subsidies would be provided on behalf of defendant GINGER HANDS.

11. On or after May 23, 2001, defendant GINGER HANDS paid \$600 to Charmaine Mabry for causing a PHA Section 8 appointment letter to be issued to defendant GINGER HANDS

12. On or before July 25, 2001, defendant GINGER HANDS told defendant YOLANDA DEMPSEY about Charmaine Mabry's scheme.

13. On or before July 25, 2001, defendant YOLANDA DEMPSEY told defendant GINGER HANDS to provide defendant YOLANDA DEMPSEY's cellular telephone

number to Charmaine Mabry in order for defendant YOLANDA DEMPSEY to obtain a Section 8 voucher through Charmaine Mabry.

14. On or about July 25, 2001, Charmaine Mabry accessed the PHA database and made fraudulent entries so that Section 8 housing subsidies would be provided on behalf of defendant YOLANDA DEMPSEY.

15. On or after July 25, 2001, defendant YOLANDA DEMPSEY paid \$500 to Charmaine Mabry for causing a PHA Section 8 appointment letter to be issued to defendant YOLANDA DEMPSEY.

16. On or before July 26, 2001, defendant GINGER HANDS told defendant TOMIKA CAISON about Charmaine Mabry's scheme, that defendant GINGER HANDS had obtained a Section 8 voucher through Charmaine Mabry, and that defendant GINGER HANDS had heard about Charmaine Mabry's scheme from defendant LIZA JONES.

17. On or before July 26, 2001, defendant GINGER HANDS told defendant TOMIKA CAISON that Charmaine Mabry would provide defendant TOMIKA CAISON with a Section 8 voucher for \$700.

18. On or before July 26, 2001, defendant TOMIKA CAISON told defendant GINGER HANDS to provide Charmaine Mabry with defendant TOMIKA CAISON's telephone number in order for defendant TOMIKA CAISON to obtain a Section 8 voucher through Charmaine Mabry.

19. On or about July 26, 2001, Charmaine Mabry accessed the PHA database and made fraudulent entries so that Section 8 housing subsidies would be provided on behalf of defendant TOMIKA CAISON.

20. On or after July 26, 2001, defendant TOMIKA CAISON paid at least \$400 to Charmaine Mabry for causing a PHA Section 8 appointment letter to be issued to defendant TOMIKA CAISON.

21. On or before July 26, 2001, defendant TOMIKA CAISON told defendant DELORES DOLISON about Charmaine Mabry's scheme.

22. On or before July 26, 2001, defendant DELORES DOLISON told defendant TOMIKA CAISON to provide Charmaine Mabry with defendant DELORES DOLISON's telephone number in order for defendant DELORES DOLISON to obtain a Section 8 voucher through Charmaine Mabry.

23. On or before July 26, 2001, defendant DELORES DOLISON told defendant NICOLE DOLISON about Charmaine Mabry's scheme.

24. On or before July 26, 2001, defendant DELORES DOLISON provided Charmaine Mabry with defendant NICOLE DOLISON's telephone number in order for NICOLE DOLISON to obtain a Section 8 voucher through Charmaine Mabry.

25. On or about July 26, 2001, Charmaine Mabry accessed the PHA database and made fraudulent entries so that Section 8 housing subsidies would be provided on behalf of defendant DELORES DOLISON.

26. On or after July 26, 2001, defendant DELORES DOLISON paid \$650 to Charmaine Mabry for causing a PHA Section 8 appointment letter to be issued to defendant DELORES DOLISON.

27. On or about July 26, 2001, Charmaine Mabry accessed the PHA database and made fraudulent entries so that Section 8 housing subsidies would be provided on behalf of defendant NICOLE DOLISON.

28. On or after July 26, 2001, defendant NICOLE DOLISON paid \$700 to Charmaine Mabry for causing a PHA Section 8 appointment letter to be issued to defendant NICOLE DOLISON.

29. On or about August 29, 2001, defendant TOMIKA CAISON leased 631 E. Wishart Street, Philadelphia, Pennsylvania, which caused Section 8 housing subsidies to be paid on behalf of TOMIKA CAISON.

30. On or about September 15, 2001, defendant DELORES DOLISON leased 3835 Lawndale Street, Philadelphia, Pennsylvania, which caused Section 8 housing subsidies to be paid on behalf of defendant DELORES DOLISON.

31. On or about September 15, 2001, defendant MARIE BUSH leased 360 E. Tulpehocken Street, Apartment B-6, Philadelphia, Pennsylvania, which caused Section 8 housing subsidies to be paid on behalf of defendant MARIE BUSH.

32. On or about September 26, 2001, defendant GINGER HANDS leased 2337 Catherine Street, Philadelphia, Pennsylvania, which caused Section 8 housing subsidies to be paid on behalf of defendant GINGER HANDS.

33. On or about October 24, 2001, defendant NICOLE DOLISON leased 4102 Ogden Street, Apartment B, Philadelphia, Pennsylvania, which caused Section 8 housing subsidies to be paid on behalf of defendant NICOLE DOLISON.

34. On or about October 26, 2001, defendant LIZA JONES leased 360 E. Tulpehocken Street, Apartment C-12, Philadelphia, Pennsylvania, which caused Section 8 housing subsidies to be paid on behalf of defendant LIZA JONES.

In violation of Title 18, United States Code, Section 371.

COUNT TWO

1. Paragraphs 1 through 13 of Count One of this Indictment are realleged here.

2. On or after May 15, 2001, in the Eastern District of Pennsylvania, defendant

LIZA JONES

corruptly gave, offered, and agreed to give things of value, that is, a cash payoff, to Charmaine Mabry, an agent and employee of PHA, an organization which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, subsidy, or other form of federal assistance, with intent to influence and reward Charmaine Mabry in connection with a business, transaction, and series of transactions of PHA involving anything of value of \$5,000 or more, that is Section 8 housing subsidies totalling at least \$5,340.

In violation of Title 18, United States Code, Section 666(a)(2) and (b).

COUNT THREE

1. Paragraphs 1 through 13 of Count One of this Indictment are realleged here.

2. On or after May 15, 2001, in the Eastern District of Pennsylvania, the defendant

MARIE BUSH

corruptly gave, offered, and agreed to give things of value, that is, a cash payoff, to Charmaine Mabry, an agent and employee of PHA, an organization which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, subsidy, or other form of federal assistance, with intent to influence and reward Charmaine Mabry in connection with a business, transaction, and series of transactions of PHA involving anything of value of \$5,000 or more, that is Section 8 housing subsidies totalling at least \$6,094.

In violation of Title 18, United States Code, Section 666(a)(2) and (b).

COUNT FOUR

1. Paragraphs 1 through 13 of Count One of this Indictment are realleged here.

2. On or after May 23, 2001, in the Eastern District of Pennsylvania, the defendant

GINGER HANDS

corruptly gave, offered, and agreed to give things of value, that is, a cash payoff, to Charmaine Mabry, an agent and employee of PHA, an organization which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, subsidy, or other form of federal assistance, with intent to influence and reward Charmaine Mabry in connection with a business, transaction, and series of transactions of PHA involving anything of value of \$5,000 or more, that is Section 8 housing subsidies totalling at least \$11,583.

In violation of Title 18, United States Code, Section 666(a)(2) and (b).

COUNT FIVE

1. Paragraphs 1 through 13 of Count One of this Indictment are realleged here.

2. On or after July 26, 2001, in the Eastern District of Pennsylvania, the defendant

TOMIKA CAISON

corruptly gave, offered, and agreed to give things of value, that is, a cash payoff, to Charmaine Mabry, an agent and employee of PHA, an organization which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, subsidy, or other form of federal assistance, with intent to influence and reward Charmaine Mabry in connection with a business, transaction, and series of transactions of PHA involving anything of value of \$5,000 or more, that is Section 8 housing subsidies totalling at least \$5,000.

In violation of Title 18, United States Code, Section 666(a)(2) and (b).

COUNT SIX

1. Paragraphs 1 through 13 of Count One of this Indictment are realleged here.

2. On or after July 26, 2001, in the Eastern District of Pennsylvania, the defendant

DELORES DOLISON

corruptly gave, offered, and agreed to give things of value, that is, a cash payoff, to Charmaine Mabry, an agent and employee of PHA, an organization which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, subsidy, or other form of federal assistance, with intent to influence and reward Charmaine Mabry in connection with a business, transaction, and series of transactions of PHA involving anything of value of \$5,000 or more, that is Section 8 housing subsidies totalling at least \$7,810.

In violation of Title 18, United States Code, Section 666(a)(2) and (b).

COUNT SEVEN

1. Paragraphs 1 through 13 of Count One of this Indictment are realleged here.

2. On or after July 26, 2001, in the Eastern District of Pennsylvania, the defendant

NICOLE DOLISON

corruptly gave, offered, and agreed to give things of value, that is, a cash payoff, to Charmaine Mabry, an agent and employee of PHA, an organization which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, subsidy, or other form of federal assistance, with intent to influence and reward Charmaine Mabry in connection with a business, transaction, and series of transactions of PHA involving anything of value of \$5,000 or more, that is Section 8 housing subsidies totalling at least \$6,820.

In violation of Title 18, United States Code, Section 666(a)(2) and (b).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney